

In re:

Case No. 18-03113 (JJT)

## Chapter 13

## OBJECTION TO CONFIRMATION

Wells Fargo Bank, N.A. (“Wells Fargo”), a secured creditor of the Debtors, objects to the Debtors’ plan for the following reasons:

A. The plan does not deal with/does not mention Wells Fargo in regards to the

**2012 Fiat 500.** Wells Fargo objects, on the basis that if the plan were to complete early, and complete before the loan maturity date of the Debtors' secured loan with Wells Fargo, there is a risk that the Debtors will take the position that their loan with Wells Fargo has been discharged under §1325. To resolve this issue, the plan should be amended to include Wells Fargo in section 2(B), to provide that the claim of Wells Fargo is unaffected by the plan and will not be discharged upon completion of the plan.

/s/ William E. Craig  
William E. Craig, attorney for  
Wells Fargo Bank, N.A.

Dated: 11/1/18